

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CIVIL ACTION 3:16-CV-00819 FDW-DCK

JUSTIN DRISKELL,)
)
Plaintiff,)
)
-vs)
)
SUMMIT CONTRACTING GROUP, INC.)
)
Defendant.)

**PLAINTIFF'S SECOND MOTION FOR
REASONABLE ATTORNEYS' FEES**

Pursuant to Fed. R. Civ. P. 56(c) and N.C. Gen. Stat. § 95-243(c), Plaintiff respectfully submits this Second Motion for Reasonable Attorneys' Fees, seeking fees incurred from February 21, 2018 through the date of this filing, representing 599.4 hours of work, and totaling \$224,955 in attorneys' fees.

In support of this Motion, Plaintiff incorporates by reference the Memorandum and Affidavits previously filed February 20, 2018 (Doc. 57), as well as the Memorandum and Exhibits filed contemporaneously herewith.

Pursuant to Local Rule 7.4 (W.D.N.C.), the Plaintiff certifies that he has conferred in good faith with the Defendant prior to submitting this motion, and the parties were unable to reach agreement.

/

/

/

/

Respectfully submitted this 20th day of November, 2020.

/s/ Nicole K. Haynes

Joshua R. Van Kampen (NC Bar No. 32168)

Nicole Haynes (NC Bar No. 47793)

Van Kampen Law, PC

315 E. Worthington Avenue

Charlotte, NC 28203

Phone: (704) 247-3245

Fax: (704) 749-2638

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES that the pleading to which this certificate is attached was filed electronically with the Court's CM/ECF system, which effects electronic service upon each party to this action by email at the addresses stated below:

R. Taylor Speer, Esq.
Reginald W. Belcher, Esq.
Turner Padgett, SEP 17 2020 200 East Broad Street, Suite 250
Greenville, SC 29601
Phone: (864) 552-4618
Fax: (864) 282-5993
Email: tspeer@turnerpadgett.com
Email: rbelcher@turnerpadgett.com
Attorney for Defendant

This the 20th day of November, 2020.

/s/ Nicole K. Haynes
Joshua R. Van Kampen (NC Bar No. 32168)
Nicole Haynes (NC Bar No. 47793)
Van Kampen Law, PC
315 E. Worthington Avenue
Charlotte, NC 28203
Phone: (704) 247-3245
Fax: (704) 749-2638
Attorneys for Plaintiff